

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

RAVENWHITE LICENSING LLC,

Plaintiff,

v.

THE HOME DEPOT, INC. and HOME DEPOT
U.S.A., INC.,

Defendants.

Case No. 2:23-CV-0423-JRG-RSP

LEAD CASE

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND
DEADLINES FOR VENUE DISCOVERY AND MOTION TO DISMISS BRIEFING**

Plaintiff RavenWhite Licensing LLC (“RavenWhite”) and Defendants The Home Depot, Inc. and Home Depot U.S.A., Inc. (collectively referred to as “Home Depot”), jointly move the Court for a three week extension of the time for: (1) Home Depot to respond and object to Plaintiff’s Venue Discovery Interrogatories (Nos. 1-7) and Requests for Production (Nos. 1-7), (2) the close of Venue Discovery, and (3) Plaintiff’s opposition to the Motion to Dismiss and Home Depot’s reply in support of its Motion to Dismiss. These deadlines are currently set by the Court’s Order granting the Motion for Limited Expedited Venue Discovery and Extension of Time to Respond to Home Depot’s Renewed Motion to Dismiss the Amended Complaint Based on Improper Venue [Dkt. 49], issued on January 26, 2024.

The proposed extended deadlines are as follows:

Event	Current Deadline	Proposed Extended Deadline
Home Depot’s responses and objections to Plaintiff’s Venue Discovery Interrogatories (Nos. 1-7) and Requests for Production (Nos.1-7)	March 13, 2024	April 3, 2024

Venue discovery to be completed	April 5, 2024	April 26, 2024
Plaintiff's opposition to Motion to Dismiss	April 19, 2024	May 10, 2024
Home Depot's reply brief in support of Motion to Dismiss	May 3, 2024	May 24, 2024

Good cause for the extension exists because Home Depot client representatives have been out of the office due to personal reasons, and the three week extension will allow Home Depot the opportunity to prepare more fulsome responses to the venue discovery. The extension would also aid the parties in scheduling of the venue discovery deposition due to expected witness scheduling issues in the presently allotted time period. The requested extension will not delay any of the other deadlines in the case, and both sides are in agreement with the requested extension.

Dated: March 12, 2024

Respectfully submitted,

/s/ Eric H. Findlay

Nicholas G. Papastavros
Safraz W. Ishmael
DLA PIPER LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110-1447
Telephone: 617.406.6000
Facsimile: 617.406.6119
nick.papastavros@dlapiper.com
safraz.ishmael@us.dlapiper.com

Eric H. Findlay
Texas Bar No. 00789886
Brian Craft
Texas Bar No. 04972020
FINDLAY CRAFT, P.C.
7270 Crosswater Avenue, Suite B
Tyler, TX 75703
Tel: 903-534-1100
Fax: 903-534-1137
Email: efindlay@findlaycraft.com
Email: bcraft@findlaycraft.com

Attorneys for The Home Depot, Inc. and Home Depot U.S.A., Inc.

/s/ Robert C. Mattson

Robert F. Kramer
CA Bar No. 181706 (Admitted E.D. Texas)
rkramer@krameralberti.com
David Alberti
CA Bar No. 220265 (Admitted E.D. Texas)
dalberti@krameralberti.com
Sam Lim
CA Bar No. 211836 (Admitted E.D. Texas)
slim@krameralberti.com
Russel S. Tonkovich
CA Bar No. 233280 (Admitted E.D. Texas)
rtonkovich@krameralberti.com
Robert C. Mattson (*pro hac vice*)
VA Bar No. 34568
rmattson@krameralberti.com
**KRAMER ALBERTI LIM
& TONKOVICH & LLP**
577 Airport Blvd., Ste 250
Burlingame, CA 94010
Telephone: 650-825-4300
Facsimile: 650-460-8443

THE DACUS FIRM, P.C.

Deron R. Dacus
ddacus@dacusfirm.com
821 ESE Loop 323, Suite 430

Tyler, TX 75701
Telephone: 903-705-7233
Facsimile: 903-581-2543

Attorney for Plaintiff RavenWhite Licensing LLC

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is joint.

/s/ Nicholas G. Papastavros
Nicholas G. Papastavros

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2024, the foregoing was electronically filed with the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Eric H. Findlay
Eric H. Findlay